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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HUGH S. PROCTOR, an individual; and SP
TRUST, a Nevada trust,

Plaintiffs,

v.

CPF RECOVERY WAYS, LLC, a Delaware
limited-liability company; CHICAGO
PACIFIC CAPITAL, LP, a Delaware limited
partnership; GOLDSTREAM, LLC, a Utah
limited-liability company; NORTH
AMERICAN MANAGEMENT, LLC, a
Utah limited-liability company; PARSONS
BEHLE & LATIMER, a Utah professional
corporation; LAWRENCE LEISURE, an
individual; GEOFFREY W. MAGNUM, an
individual; JAMES R. PETERSEN, an
individual; JOHN ROBERTSON, an
individual; and MARY TOLAN, an
individual,

Defendants.

Case No.: 2:14-cv-01693-RFB-PAL

**STIPULATION AND ORDER TO
DISMISS ALL CLAIMS WITH
PREJUDICE**

STIPULATION AND ORDER TO DISMISS ALL CLAIMS WITH PREJUDICE

IT IS HEREBY STIPULATED AND AGREED by and between, the Plaintiffs, Hugh S. Proctor and SP Trust by and through their attorney Steven Gibson, along with the Defendants Parsons Behle & Latimer (“Parsons Behle”) and Geoffrey W. Mangum (“Mr. Mangum”) (together, the “Law Firm Defendants”), by and through their counsel, the law firm of Bailey Kennedy; Defendants CPF Recovery Ways, LLC (“CPF Recovery Ways”), Chicago Pacific Capital, LP f/n/a Chicago Pacific Capital, LLC (“Chicago Pacific”), Lawrence Leisure (“Mr. Leisure”), and Mary Tolan (“Ms. Tolan”) (collectively, the “Chicago Defendants”), by and through their counsel, the law firms of Armstrong Teasdale, LLP and Pederson & Houpt; and Defendants Goldstream, LLC (“Goldstream”), North American Management, LLC (“NAM”), James R. Petersen (“Mr. Petersen”), and John Robertson (“Mr. Robertson”) (collectively, the “Utah Defendants”), by and through their counsel, the law firm of Carbajal & McNutt, LLP, that in accordance with the terms of the Settlement Agreement reached by the parties on April 2, 2015 and pursuant to FRCP 41(a)(1)(A)(ii), the Parties hereby jointly request that this Court dismiss the above-referenced action with Prejudice, each party to bear its own costs and attorneys’ fees.¹

IT IS SO STIPULATED.

DATED this 30th day of April 2015.

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¹ This provision will not affect CPF Recovery Ways, LLC; Chicago Pacific Capital, LP; Mary Tolan; and Lawrence Leisure’s indemnification rights under the parties’ agreements.

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Mary Tolan

**Admitted Pro Hac Vice*

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 4th day of May, 2015.